

## REMARKS

Applicants have amended claim 1 to reflect the invention as disclosed.

Applicants thank the Examiner for allowing claims 8-11 and indicating additional allowable subject matter.

The Examiner requested that the Title of the invention be clearly indicative of the invention to which the claims are directed. Accordingly, applicants have amended the Title to read SEMICONDUCTOR DEVICE WITH ISOLATED STORAGE CAPACITOR AND ITS MANUFACTURING METHOD.

Claims 1-6 have been rejected under 35 USC 102(b) as anticipated by U.S. Patent No. 6,181,398 (Libsch). Applicants respectfully traverse this rejection.

Claim 1 as amended states that the second semiconductor portion is disposed between the substrate and the storage capacitor electrode. This amendment reflects the structure manufactured according to the method of allowed claim 8 that states that the storage capacitor electrode is formed on the insulating film that is formed on the second semiconductor portion that is formed on the substrate.

The Examiner equates Libsch's  $N^+$  silicon region shown on the right side of FIG. 6a to the claimed storage capacitor electrode and Libsch's polysilicon layer P1 to the claimed second semiconductor portion. However, Libsch's device has the storage capacitor electrode, i.e., Libsch's  $N^+$  silicon region, between the substrate and the second semiconductor portion, i.e., Libsch's polysilicon layer P1. On the contrary, the claimed semiconductor device has the second semiconductor portion between the substrate and the storage capacitor electrode.

The rejection of claims 1-6 under 35 USC 102(b) on Libsch should be withdrawn because Libsch does not teach or suggest the claimed configuration of the substrate, the second semiconductor portion and the storage capacitor electrode.

The Examiner stated as a reason for allowing the claims that the first and second semiconductor portions are formed directly on the surface of the substrate. See page 4 of the Action. Applicants note that this limitation is not required to overcome the rejection, although such a configuration is included in the claim scope. As long as the arrangement of the substrate, the second semiconductor portion and the storage capacitor electrode in this order, as recited in claims 1 and 8, is met, the invention is distinguishable over Libsch.

In light of the above, a Notice of Allowance is solicited.

In the event that the transmittal letter is separated from this document and the Patent and Trademark Office determines that an extension and/or other relief is required, applicants petition for any required relief including extensions of time and authorize the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to

**Deposit Account No. 03-1952**, referencing Docket No. **492322014700**.

Respectfully submitted,

Dated: October 22, 2004

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